IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

BRANDON MATTHEW JONES) CHAPTER 13
DEBTOR)
) CASE NO. 1:23-bk-01084-HWV
HEARTHRIDGE AT THE DOMINION	$(\mathbf{J}, \dot{\mathbf{J}})$
HOMEOWNERS ASSOCIATION, INC	.)
MOVANT)
)
VS.)
)
BRANDON MATTHEW JONES)

DEBTOR'S RESPONSE TO HEARTHRIDGE AT THE DOMINION, HOMEOWNERS ASSOCIATION, INC., MOTION FOR RELIEF FROM AUTOMATIC STAY

- 1. Movant, Hearthridge at the Dominion, Homeowners Association, Inc., filed its Motion for Relief from Stay on November 6, 2023.
- 2. Debtor acknowledges some Homeowners Association payments are past due.
- 3. Debtor desires the opportunity to cure any post-petition Homeowners Association arrears and keep his home.
- 4. Debtor requests the Court deny Movant's Motion for Relief.

WHERFORE, Debtor, Brandon Matthew Jones, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed November 6, by Hearthridge at the Dominion, Homeowners Association, Inc.

Dated: November 10, 2023

/s/Nicholas G. Platt Nicholas G. Platt (327239) Counsel for Debtor Mooney Law 230 York Street Hanover, PA 17331 ngp@mooney4law.com (717) 243-4770 Phone (717) 632-3612 Fax